

11/19/19 PM 3:33

IN THE UNITED STATES DISTRICT COURT, DISTRICT OF COLUMBIA
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,

I N D I C T M E N T

Plaintiff,

4 : 19 CR 721

v.

WILLIAM DRAHER,

CASE NO.
Title 18, United States Sections
922(a)(1)(A), 923(a), and
924(a)(1)(D)

Defendant.

JUDGE GWIN

COUNT 1

(Engaging in Business of Selling Firearms without a License,
18 U.S.C. §§§ 922(a)(1)(A), 923(a), and 924(a)(1)(D))

The Grand Jury charges:

1. From in or about January, 2013 to on or about July 17, 2018, in the Northern District of Ohio, Eastern Division, Defendant WILLIAM DRAHER, not being a licensed dealer of firearms within the meaning of Chapter 44, title 18, United States Code, did willfully engage in the business of dealing in firearms, in violation of Title 18, United States Code, Sections 922(a)(1)(A), 923(a), and 924(a)(1)(D).

FORFEITURE

The Grand Jury further charges:

2. The allegations of Count 1 are hereby re-alleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c). As a result of the foregoing offense, Defendant WILLIAM DRAHER shall forfeit to the United States all property

involved in the commission of the violation charged herein; including, but not limited to, the following:

- A. Ruger SR40 Pistol Cal: 40, Serial #34264190;
- B. Glock Inc. 22 Pistol Cal: 40, Serial #CRV287US;
- C. Kimber Ultra Carry II Pistol, Cal: 9, Serial #KUF3669;
- D. FMK Firearms Inc. AR-1 Patriot, Cal: 9, Serial #BGG0015;
- E. Hi-Point C9 Pistol, Cal: 9, Serial #P1768823;
- F. Diamondback Arms Inc. Db380, Pistol, Cal. 380, Serial #ZC0506,
- G. Armscor of the Philippines (Squire Bingham) 206 Revolver, Cal: 38, Serial #RIA1702070;
- H. Colt Combat Commander Pistol, Cal: 45, Serial #FC02867e;
- I. Taurus International PT24/7, Pistol, Cal: 9, Serial #TWK30462;
- J. Smith & Wesson 59 Pistol, Cal: 9, Serial #A557356;
- K. FMK Firearms Inc. Unknown Type Pistol, Cal: Unknown, Serial #BB9703;
- L. Cobra Enterprises Inc./Kodiak Ind. FS380 Pistol, Cal: 380, Serial #FS112511;
- M. Charles Lancaster & Co. Unknown Type Pistol, Cal: Unknown, Serial #T7394-09G04577;
- N. Springfield Armory, Geneseo, IL Unknown Type Pistol, Cal: Unknown, Serial #S3238796;
- O. Hi-Point C9 Pistol, Cal: 9, Serial #P1721457;
- P. Hi-Point C Pistol, Cal: 9, Serial #32666;
- Q. Kimber Sapphire Ultra ii Pistol, Cal: 9, Serial #KSU0540;
- R. ISSC m22 Pistol, Cal: 22, Serial #A03295;
- S. FMK Firearms Inc. Unknown Type Pistol, Cal: Unknown, Serial #A1537,
- T. Cobra Enterprises, Inc./Kodiak Ind. Denali 380 Pistol Cal: 380, Serial #K12228;

- U. Springfield Armory, Geneseo, IL Unknown Type Pistol, Cal: Unknown, Serial #XD518098;
- V. Hi-Point Unknown Type Pistol, Cal: Unknown, Serial #X7138162;
- W. ISSC m22 Pistol, Cal: 22, Serial #A08662;
- X. SCCY Industries, LLC (Skyy Ind.) CPX-1 Pistol, Cal: 9, Serial #668275;
- Y. FMK Firearms Inc. Unknown Type Pistol, Cal: Unknown, Serial #BOD1031;
- Z. FNH USA, LLC Unknown Type Pistol, Cal: Unknown, Serial #517MM10856;
- AA. Hi-Point Unknown Type Pistol, Cal: Unknown, Serial #X468147,
- BB. Jimenez Arms J.A. Nine Pistol, Cal: 9, Serial #159766;
- CC. Bersa Thunder 380 Pistol, Cal: 380, Serial #751425;
- DD. Remington Arms Company, Inc., RP9 Pistol Cal: 9, Serial #RP028183H;
- EE. Jennings Firearms Unknown Type Pistol, Cal: Unknown, Serial #634613,
- FF. Jimenez Arms J.A. Nine Pistol, Cal: 9, Serial #167951;
- GG. Bryco Arms 59 Pistol, Cal: 9, Serial #920717;
- HH. Canik 55 TP9 Pistol, Cal: 9, Serial #16AI03379;
- II. FNH USA, LLC Unknown Type Pistol, Cal: Unknown, Serial #517NN02819;
- JJ. Llama (Gabilondo & cia) Unknown Type Pistol, Cal: Unknown, Serial #416335;
- KK. Hi-Point C Pistol, Cal: 9, Serial #804072;
- LL. Jimenez Arms J.A. 22 Pistol, Cal: 22, Serial #1277013;
- MM. SCCY Industries, LLC (Skyy Ind.) CPX-1 Pistol, Cal: 9, Serial #457031; and,
- NN. Savage 93R17 Rifle, Cal: 17, Serial #1710120.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.